



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

JUL 11 2012

Ref: 8EPR-N

Mr. Robert J. Thompson, District Ranger
Mystic Ranger District
Black Hills National Forest
8221 South Highway 16
Rapid City, SD 57702

RE: EPA Comments on Draft Environmental Impact
Statement, Calumet Project, CEQ #20120188

Dear Mr. Thompson:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, *et seq.*, and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the June 2012 Draft Environmental Impact Statement (DEIS) for the Calumet Project. This DEIS was prepared by the Mystic Ranger District of the U.S. Department of Agriculture Forest Service (USFS) Black Hills National Forest to analyze potential environmental impacts associated with proposed vegetation treatments to reduce the threat to communities and forest resources from the existing mountain pine beetle (MPB) epidemic and large-scale wildfire.

The Calumet Project Area is approximately 6 miles southwest of Rapid City, South Dakota, and covers 31,772 acres, including 27,617 acres of USFS lands and 4,155 acres of interspersed private lands. Sheridan Lake is located within the project area.

A summary of the two alternatives analyzed in the DEIS is as follows:

- Alternative A (No Action) - no vegetation or fuels management actions; and
- Alternative B (Proposed Action) – 19,304 acres of mechanical vegetation treatments (including thinning, hardwood/meadows/grasslands retention and restoration and cable logging); 15,990 acres of prescribed burning; and 5 miles of new roads/27 miles of road reconstruction.

In a November 8, 2011 letter, EPA provided scoping comments for this project. We appreciate that the USFS addressed many of our comments in the DEIS. As a result, our concerns with the June 2012 DEIS have been narrowed to the following issues: (1) aquatic resources and (2) air quality. These concerns are the basis for the EPA's EC-2 rating discussed at the conclusion of this letter.

1) Aquatic resources in the project area are of critical importance, requiring evaluation and mitigation of associated impacts.

The EPA considers protection of aquatic resources to be among the most important issues to be addressed in any NEPA analysis for vegetation management activities. Most treatments contemplated under the proposed action (e.g., thinning, overstory removal, sanitation harvest, cable logging, prescribed fire, and road construction) have the potential to adversely impact aquatic resources, including surface and ground waters, wetlands, streams, riparian areas, and their supporting hydrology. The Calumet Project DEIS provides good disclosure of existing aquatic conditions in the project area and potential project impacts. To further enhance disclosure and protection of aquatic resources, we offer a few suggestions, as discussed below.

Existing Conditions: The Water Resources section of the DEIS references several important maps that are available in the project file, including a map of streams and a map of known wetlands, riparian areas, springs, fens and other ground water-dependent ecosystems. In order to better understand existing aquatic resource conditions, particularly for those resources near proposed treatment areas, we recommend including these maps in the DEIS Appendix E, Maps. In addition, on p. 100 of the DEIS, the Surface Water Quality section notes that recent water quality data for numerous parameters are available from the USGS monitor on Spring Creek, just above the Sheridan Lake inlet. To understand current water quality conditions and inform future monitoring following project completion, we recommend that a brief summary of these data be included in the DEIS.

Also, on pp. 95 and 111 of the DEIS, the Stream Channel Stability and Floodplains and the Ground Water-Dependent Ecosystems sections each reference additional water quality monitoring and field investigations necessary to quantitatively validate or revise several of the general stream health assessments and to confirm several fens identified in initial field investigations. We recommend clarifying that USFS is committing to complete these additional investigations and monitoring.

Design Criteria, Mitigation Measures and Monitoring Plan: We support the Appendix B list of project design criteria, mitigation measures and monitoring requirements to protect aquatic resources, including special requirements for streams, lakes, wetlands, riparian areas, and ground water-dependent ecosystems (e.g., fens and springs). To ensure that project activities do not adversely impact aquatic resources, we recommend expanding the list as follows:

- Specify steps to protect range improvements (i.e., water developments, spring exclosures, fencing, corrals, etc.) from prescribed burning.
- Specify a 5-year timeframe for monitoring hydrophobic soils following prescribed burns.
- Monitor effectiveness of temporary and new road closures following treatment and adjust closure methods, if necessary.
- Monitor off-highway vehicle use in treatment areas following completion of project activities to ensure that removal of trees has not created access to non-designated areas.
- Clarify that the Appendix B project design criteria identified for wetlands apply to all wetlands, regardless of whether each wetland meets the regulatory definition of “jurisdictional,” as noted on p. 109 of the DEIS.
- Monitor revegetation efforts for 5 years to ensure success.

EPA's Rating and Recommendation

Consistent with Section 309 of the CAA, it is EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action, The EPA is rating this DEIS as Environmental Concerns – Insufficient Information (EC-2). The "EC" rating indicates that EPA review has identified environmental impacts that need to be avoided in order to fully protect the environment. The "2" rating indicates that the EPA has identified additional information, data, analyses or discussion that should be included in the Final EIS to disclose and fully assess project impacts. A full description of EPA's rating system is enclosed.

We hope that our comments regarding aquatic resources and air quality will assist you in further reducing the environmental impacts of this project. We appreciate the opportunity to review and comment on this DEIS. If we may provide further explanation of our comments, please contact me at 303-312-6925, or your staff may contact Amy Platt at 303-312-6449.

Sincerely,



for Suzanne J. Bohan
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

Enclosure: U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements

- Specify steps to protect the Sheridan Lake North Marina Public Water Supply from project impacts.
- Monitor Sheridan Lake and its major inlet stream, Spring Creek, to ensure effectiveness of project design criteria in meeting the Total Maximum Daily Load requirements for management activities to reduce phosphorus loading.

2) Air quality impacts associated with the project are a critical concern that must be fully evaluated.

It is particularly important to assess and mitigate air quality impacts associated with the Calumet Project given the project area is near the population center of Rapid City and two mandatory Class I Federal areas (Wind Cave National Park and Badlands National Park). We appreciate that the DEIS includes an Air Quality section that addresses many of our scoping recommendations related to air quality, including a summary of available data for existing conditions, a qualitative discussion of potential project emissions from prescribed fire and pile burns and a description of mitigation measures to address related prescribed fire emissions.

Existing Conditions: Information regarding current conditions will be an important tool for monitoring the impacts of project activities. Decision-makers will need to understand baseline conditions in an effort to ensure that Calumet Project activities, when combined with air quality impacts from external sources, do not adversely impact the National Ambient Air Quality Standards (NAAQS) or air quality related values (AQRVs). While the DEIS does provide some baseline data related to the NAAQS, no baseline data are presented for Class I Federal areas near the project area. Therefore, we recommend broadening the existing conditions discussion to include the trending of air quality at the nearby Class I Federal areas over the past several years. (See the VIEWS site for AQRVs at <http://views.cira.colostate.edu/web/>.)

Prescribed Fire: The proposed action includes the application of prescribed burning over multiple years to a total of 15,990 acres. This significant prescribed fire activity may cause degradation of air quality in the region. We appreciate the clear explanation of potential prescribed fire impacts and the detailed steps to minimize such impacts. We fully support the prescribed fire design criteria and monitoring recommendations as outlined in the Fire and Fuels section of the DEIS and as detailed in Appendix B. Since the proposed action also includes the use of pile burning, please clarify whether pile burns are included in the Burn Plans prepared for prescribed fire applications and/or are subject to the same process described in the Interagency Prescribed Fire Planning and Implementation Procedures Guide (July 2008).

Dust Control: Air quality and AQRVs are negatively impacted by dust. Under the proposed action, 15 miles of temporary roads are proposed. We recommend that detailed dust control plans be developed to include mitigation measures such as dust abatement, speed limits on unpaved roads, prompt revegetation and monitoring. Since dust can also severely impact vegetation along roadways, as well as contribute to water quality concerns associated with runoff of salts and sediments, we recommend that the monitoring plan include a schedule for 5 years post revegetation to ensure success. Given the challenges associated with reclamation, the EPA believes that reduction of surface disturbance will be the most effective means of reducing dust in the Calumet Project Area.

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements

Definitions and Follow-Up Action*

Environmental Impact of the Action

LO -- Lack of Objections: The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC -- Environmental Concerns: The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO -- Environmental Objections: The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU -- Environmentally Unsatisfactory: The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 -- Adequate: EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 -- Insufficient Information: The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new, reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 -- Inadequate: EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

